

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

PETER LORA, et al

1:07 CV 2787

V.

JUDGE DAN AARON POLSTER

DEAN BOLAND

NOTICE OF DEPOSITION
DUCES TECUM

Now comes Dean Boland and gives notice that he will be taking the following deposition:

1. Witness, Jane Doe #2.

Place: Offices of Dean Boland
18123 Sloane Avenue
Lakewood, Ohio 44107
216-529-9371 phone
Date: Tuesday, March 3, 2009
Time: 9:00 A.M.

DUCES TECUM: Plaintiff Doe #2 is commanded to bring with him or her and produce for inspection the following:

1. All documents related to any claim as to reputation damage resulting from defendant's alleged conduct.
2. All documents related to any claim as to financial damage resulting from defendant's alleged conduct.
3. All documents related to any claim as to psychological damage resulting from defendant's alleged conduct.
4. All documents related to any claim as to physical damage resulting from defendant's alleged conduct.

Since Plaintiff is a party to this action, no subpoena will be issued. This deposition is taken pursuant to Rule 30 of the Federal Rules of Civil Procedure, and will be continued from day to day until completed and may be used as evidence in the trial of this matter.

Respectfully submitted,

/s/ Dean Boland
Dean Boland, Esq.
18123 Sloane Avenue
Lakewood, Ohio 44017
dean@deanboland.com

Proof of Service

A true and accurate copy this Notice of Deposition has been electronically served this 28th day of January, 2009 on all parties as a function of the electronic filing system:

/s/ Dean Boland
DEAN BOLAND
Supreme Court Reg. No. 0065693